

E-filed 6/13/06

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7
8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA
10 SAN JOSE DIVISION

11 UNITED STATES OF AMERICA,)	No. CR 06-00111-JF
)	
12 Plaintiff,)	
)	
13 v.)	STIPULATION AND [PROPOSED]
)	ORDER TO CONTINUE STATUS DATE
14 JOHN WHITE,)	
)	
15 Defendant.)	
_____)	

16
17 Assistant United States Attorney Carlos Singh and defendant, John White, through his
18 counsel, Assistant Federal Public Defender Angela M. Hansen, stipulate and agree that the status
19 date in the above-captioned matter, presently scheduled for June 14, 2006, at 9:00 a.m., should be
20 continued to July 26, 2006 at 9:00 a.m.

21 The offense charged involves conduct that allegedly occurred over 10 years ago. The
22 parties stipulate and agree that the status date should be continued because counsel for Mr. White
23 needs additional time to investigate this case and to collect old records that may be relevant to
24 Mr. White's defense and sentencing exposure. For these reasons, the parties stipulate and agree
25 to continue the status date to July 26, 2006.

26 The parties further stipulate and agree that under 18 U.S.C §§ 3161(h)(8)(A) and (B)(iv),
the ends of justice served by the continuance requested outweigh the best interest of the
defendant and public in a speedy trial because the failure to grant such a continuance would

1 unreasonably deny Mr. White the time necessary for effective preparation, taking into account
2 the exercise of due diligence.

3
4 SO STIPULATED.

5
6 Dated: June 12, 2006

/s/

ANGELA M. HANSEN
Assistant Federal Public Defender

7
8
9 Dated: June 12, 2006

/s/

CARLOS SINGH
Assistant United States Attorney

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,)	No. CR 06-00111-JF
)	
Plaintiff,)	[PROPOSED] ORDER CONTINUING
)	STATUS DATE AND EXCLUDING
v.)	TIME
)	
JOHN WHITE,)	
)	
Defendant.)	
_____)	

The parties have jointly requested to continue the status date and good cause appearing, IT IS HEREBY ORDERED that the status date presently set for June 14, 2006 at 9:00 a.m. is continued to July 26, 2006 at 9:00 a.m. Pursuant to the parties' stipulation, IT IS FURTHER ORDERED that the period of time from June 14, 2006 through and including July 26, 2006, shall be excluded from the period of time within which trial must commence under the Speedy Trial Act, 18 U.S.C §§ 3161(h)(8)(A) and (B)(iv).

Dated: June 13, 2006


JEREMY FOGEL
United States District Judge

1 Distribute to:

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